

**Bottcher, Helen**

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**From:** (b) (6)  
**Sent:** Sunday, June 12, 2016 5:05 PM  
**To:** wyckoffcomments  
**Subject:** Comments regarding Proposed Plan

Dear Helen Bottcher,

Thank you for the opportunity to comment on EPA's Proposed Plan for the Amendment of the ROD on the Eagle Harbor/Wyckoff site. As residents on the island, raising two small children, cleanup of the site is of paramount importance. We applaud EPA in its effort to address the site and we look forward to a cleanup that is accelerated and more effective in comparison to the first three decades of the site's listing on the NPL.

We have read the Proposed Plan and overall are pleased to see EPA's choice for Operable Units (OU) 1,2, and 4. However, we have some remaining questions and concerns that we would like to see addressed before EPA finalizes its decision for the Cleanup Plan. For ease, we have organized our concerns by OU.

**OU 1 – East Harbor**

Our main concern with the excavation and capping alternative relates to how the cap will be maintained and monitored. From our experience on the island, we recall last winter heavy rains brought significant flooding and erosion to the beaches around the island. Many beaches had logs piled up that had scoured deep channels in the shoreline. We can only imagine a winter like last would significantly disturb a sand cap. Which agency is responsible for monitoring the health of the cap once it is placed? How often will they be monitoring and what actions will be taken if the cap is found to be deteriorated in places? This is especially important if we consider that the beach will become an extension of Pritchard Park, a popular spot for kids and families on the island.

**OU 2 & 4– Upland & Groundwater**

We are interested to hear what discussion and planning has taken place regarding the preferred cleanup actions, including the bulkhead perimeter wall and the use of injecting concrete into the soil to immobilize contamination, in regards to a seismic event. Because a fault line runs underneath the site, it would be cavalier not to evaluate the consequence of an earthquake. If the bulkhead wall fails, how much contamination would be released into Eagle Harbor? Would the repair of the wall fall under an emergency action taken by the EPA?

Furthermore, given our placement over a fault line, is there a more aggressive cleanup we can perform on the highly contaminated aquifer so that if the barrier fails, which separates it from the lower aquifer, that aquifer is not contaminated?

We are especially concerned about the health of groundwater on the island as an island with a sole-source aquifer designation. Furthermore, Bainbridge Island is undergoing significant densification and thus increasing its water usage. Just last year, the new pool in Pleasant Beach exhausted the City's water resources in the area and had to have a new pipe fitted. Many farms surround the section of the island where the Wyckoff site is. While the island's growing water usage might seem tangential to the focused cleanup, it is relevant to consider that groundwater contamination might have the gravest impact if not aggressively targeted. Given that previous pumps were clogged because the copious amounts of NAPL released through extraction, we

urge EPA to not adopt a wait and see performance monitoring approach but to invest in utilizing the strategies suggested in Phase II of their preferred alternative.

We are interested to hear if EPA conducted any modeling of their ISS alternative and its effect on the upper aquifer. Would heavy construction and injection of cement impact the barrier that separates the lower aquifer from the upper? Lastly, can EPA please inform us whether floating LNAPL in the aquifer might re-contaminate the sediment that is being cleaned through ISS technologies?

In summation, we would like to applaud the EPA on its efforts to remediate the Eagle Harbor/Wyckoff site. While we appreciate EPA's preferred alternative, we strongly urge Phase II actions that address groundwater be subsumed under phase I actions. Furthermore, we would like to understand the extent to which EPA has planned for the consequences to the remaining cleanup fixtures on the site in the event of an earthquake. If not, we would encourage the EPA to do so.

Thank you for the opportunity to comment. We look forward to a cleaner island, thanks to your efforts!

Sincerely,

(b) (6)

A large grey rectangular box redacting the signature of the sender.

Bainbridge Island, WA 98110



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